

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DIVISION NORTHERN DISTRICT OF OHIO**

**IN RE: POLYURETHANE FOAM  
ANTITRUST LITIGATION**

**MDL Docket No. 2196**

**The Document Relates to:  
All Direct Purchaser Class Cases**

**Index No. 10MD2196(JZ)**

**DIRECT PURCHASER CLASS PLAINTIFFS' MOTION  
FOR PRELIMINARY APPROVAL OF VOLUNTARY DISMISSAL AND  
SETTLEMENT AGREEMENT  
WITH DEFENDANTS DOMFOAM INTERNATIONAL INC., VALLE FOAM  
INDUSTRIES (1995) INC., A-Z SPONGE & FOAM PRODUCTS LTD. AND  
INDIVIDUAL SETTLING PARTIES**

Direct Purchaser Class Plaintiffs, through their counsel, hereby move the Court pursuant to Federal Rule of Civil Procedure 23(c) and (e) for an Order in the form attached hereto preliminarily approving a proposed settlement with Defendants Domfoam International Inc., Valle Foam Industries (1995) Inc., A-Z Sponge & Foam Products Ltd., and Individual Settling Parties.

In support of this Motion, the Class of Direct Purchaser Plaintiffs rely upon and incorporate by reference herein the facts and legal arguments set forth in the accompanying Memorandum of Law.

Defendants Domfoam International Inc., Valle Foam Industries (1995) Inc., A-Z Sponge & Foam Products Ltd., and the Individual Settling Parties consent to this motion and to the entry of the proposed order.

Dated: March 7, 2012

Respectfully submitted,

/s/ William A. Isaacson  
William A. Isaacson

/s/ Stephen R. Neuwirth  
Stephen R. Neuwirth

BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Avenue, NW  
Washington, DC 20015  
Phone: 202-237-5607  
Fax: 202-237-6131  
[wisaacson@bsflp.com](mailto:wisaacson@bsflp.com)

QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Phone: 212-849-7165  
Fax: 212-849-7100  
[stephennewirth@quinnemanuel.com](mailto:stephennewirth@quinnemanuel.com)